

Complaint

FILED

MAY 01 2024

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION**LAURA A. AUSTIN, CLERK
BY: MPGP
DEPUTY CLERK**DAVID LINTON,**
Plaintiff,

v.

Donald Trump, MAGA, Et al.,
Defendant

7:24CV00292

Complaint**Paragraph 1**

Defendant, Donald Trump and Defendant, MAGA, intellectual property trademarking, naming, Defendant, Donald Trump's, racketeering influenced corrupt organization committing terrorism that transcends national boundaries, stochastic terrorism, utilized a coordinated efforts to distribute subversive materials via various means including print, internet, telecommunications and broadcast, to advocate the violent overthrow of the United States Constitution, in a conspiracy against rights, distributing subversive materials intended to undermine the citizens of the United States faith in democratic processes, incite one race to insurrection against another race, and enlist an assemblage for the purpose of executing a treasonable design; kidnapped me, Plaintiff, David Linton, Pro Se, as a mechanism to destabilize the United States, for financial gain, in a conspiracy subject to foreign influence and control, by Russia; in violation of my, Plaintiff, David Linton, Pro Se's, 1st Amendment Rights, 4th Amendment Rights, 5th Amendment Rights, and 9th Amendment Rights, guaranteed by the United States Constitution.

Paragraph 2

Defendant, Donald Trump and Defendant, MAGA's, planned and coordinated a campaign of stochastic terrorism, to compel imminent lawless action, terrorist acts, incite one race to insurrection against another race, erode faith in democratic processes and institutions, planning and incitement of a multi-prong attack in multiple States, against the Electoral College process; as a mechanism to overthrow the valid results of the 2020 Presidential election, Defendant, MAGA, kidnapped and tortured me, Plaintiff, David Linton, Pro Se, as a method to prevent me, Plaintiff, David Linton, Pro Se, a 2020 Democratic Party Delegate, pledged to Bernie Sanders, from casting my vote in an election held for Presidential Electors, Defendant, Donald Trump and Defendant, MAGA, enlisted an assemblage to attack the United States on January 6th, 2021, as a mechanism to obstruct the Electoral College process, corruptly invalidate the valid Certificates of Ascertainment, Presidential Electors, for Joe Biden, and fraudulently install Defendant, Donald Trump, in the Office of the President of the United States for a second term; including the kidnapping of me, Plaintiff, David Linton, Pro Se, from my residence, by Defendant, MAGA, and the planned kidnapping and murder of Vice President Mike Pence and members of the United States Congress for upholding their oaths to the United States Constitution, by Defendant, MAGA; Defendant, Donald Trump and Defendant, MAGA, knowingly and intentionally destabilized the United States using a coordinated propaganda regime of stochastic terrorism, corruptly attempted to prevent the peaceful transfer of power, Defendant, Donald Trump and Defendant, MAGA, committed terrorism that transcends national boundaries,

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stochastic terrorism, for the purpose of indoctrinating and radicalizing citizens of the United States, to form an assemblage of men for the purpose of executing a treasonable design, that resulted in an “actual assemblage of men for the purpose of executing a treasonable design” Ex parte Bollman & Swarthout (1807), “Intent to betray must be inferred from conduct. It may be inferred from the overt acts themselves (Cramer v. United States, supra, p. 31)” Kawakita v. United States, 343 U.S. 717, 742 (1952), Defendant, Donald Trump was acting outside of the outer perimeter of the Office of the President of the United States; Defendant, Donald Trump and Defendant, MAGA, levied war against the United States Constitution and provided aid and comfort to the enemies of the United States, Russia.

Paragraph 3

Defendant, Donald Trump and Defendant, MAGA, Defendant, Donald Trump’s, racketeering influenced corrupt organization, engaged in a conspiracy to distribute subversive materials to incite one race to insurrection against another race and violent interference with federally protected rights, in a conspiracy against rights, utilizing multiple channels of communication including print, internet, television and radio broadcast, as ordinance delivery systems; in a RICO conspiracy, with Russia, committing terrorism transcending national boundaries, a false propaganda regime of stochastic terrorism, as a mechanism to attack state elections and destabilize the United States, for financial gain.

Paragraph 4

Defendant, Donald Trump conspired with Defendant, MAGA, including Republicans and Libertarians, in elected positions within State and Federal government or who were candidates, both listed and unlisted, and employees of State and Federal governments, the right-wing extremist media ecosphere, right-wing extremist businesses, right-wing extremist academic and religious institutions, who are members of Defendant, MAGA, to commit terrorism that transcends national boundaries, a false propaganda regime of stochastic terrorism, utilizing print, internet, and broadcast, as ordinance delivery systems; under the influence and control of, Russia, spreading Covid-19 conspiracies, spreading false propaganda to build animosity between races, as a mechanism, to incite one race to insurrection against another race, and spreading false election conspiracies, as a method to undermine faith in democratic processes and democratic institutions; as an ignition, to destabilize to the United States, for financial gain.

Paragraph 5

Defendant, Donald Trump conspired with Defendant, MAGA, Jerry Falwell Jr who gave millions to Defendant, Donald Trump and Defendant, MAGA, organization, and spent millions on advertisements for Defendant, Donald Trump, and Defendant, MAGA, Charlie Kirk, Ryan Helsenbein, Phill Kline, Rudy Giuliani, John MacArthur and others both listed and unknown, to establish the Falkirk Center, recently renamed Standing for Freedom Center, at Liberty University, as an ordinance delivery system, committing stochastic terrorism; instigating animosity by Whites towards Jews, Asians and Blacks, spreading Covid-19 disinformation, lies about the Bible, false election conspiracies, and White Christian Nationalist ideologies, as a method to foment an insurrection between races and undermine faith in democratic processes and democratic institutions, in Virginia and throughout the United States; utilizing print, internet, and broadcast, to commit stochastic terrorism, as an ignition, to destabilize the United States, for financial gain.

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Paragraph 6

Defendant, Donald Trump and Defendant, MAGA, Jerry Falwell Jr along with others both listed and those unknown, conspired to make a false propaganda movie, utilizing Liberty University's resources to make, "The Trump Prophecy", a delivery system, to distribute subversive propaganda; spreading White Christian Nationalism in theaters, churches, meeting centers and households across the county, to incite one race to insurrection against another race and spreading false election conspiracies to undermine faith in democratic processes and democratic institutions; as a mechanism to destabilize the United States, for financial gain.

Paragraph 7

Defendant, Donald Trump and Defendant, MAGA, Charlie Kirk along with others both listed and those unknown, conspired to utilize Turning Point USA and Turning Point Action, as ordinance delivery systems, committing stochastic terrorism; spreading Covid-19 disinformation, fomenting animosity by Whites towards Jews, Asians and Blacks, lies about the Bible, White Christian Nationalism and false election conspiracies; utilizing print, internet, and broadcast, to commit stochastic terrorism to enlist an assemblage advocating overthrow of government in Virginia and throughout the United States, as a mechanism to destabilize the United States, for financial gain.

Paragraph 8

Defendant, Donald Trump and Defendant, MAGA, Republicans and Libertarians, in elected positions within State and Federal government or who were candidates, and employees of State and Federal governments, who are members of the Defendant, MAGA, wing of the parties, committed terrorism that transcends national boundaries, stochastic terrorism; spreading Covid-19 conspiracies, false propaganda to build animosity between races as a method to incite one race to insurrection against another race, and false election conspiracies to undermine faith in democratic processes and democratic institutions, utilizing print, internet, telecommunications, and broadcast, as ordinance delivery systems, to commit stochastic terrorism, as an ignition, to destabilize the United States; in a conspiracy, with Russia, for financial gain.

Paragraph 9

Defendant, Donald Trump conspired with Defendant, MAGA, Charlie Kirk and others both those listed and those unknown to utilize Turning Point USA, Liberty University Chapter, to acquire the address of my, Plaintiff, David Linton, Pro Se's, residence during the period of 2020 when Democratic Party Delegates were meeting and voting on Presidential Electors and how the Presidential Electors elected would cast their Electoral votes, the Electoral College process, then Defendant, MAGA, knowing that I, Plaintiff, David Linton, Pro Se, am Seminole, Jewish, and Scottish, bisexual, the pastor of a Freewill Baptist research church, a business owner who has disabilities, and a 2020 Democratic Party Delegate, pledged to Bernie Sanders, that was meeting with my fellow Democratic Party Delegates, providing support and advocacy, voting, for Presidential Electors, the Electoral College process, Defendant, MAGA, unlawfully seized and confined, kidnapped, then tortured, me, Plaintiff, David Linton, Pro Se, as a method to try and prevent me, Plaintiff, David Linton, Pro Se, in my, Plaintiff, David Linton, Pro Se's, office as a 2020 State and National Democratic Party Delegate, pledged to Bernie Sanders, from meeting with my, Plaintiff, David Linton, Pro Se's, fellow Democratic Party Delegates and casting my,

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Plaintiff, David Linton, Pro Se's, votes in an election held to determine how the Presidential Electors I, Plaintiff, David Linton, Pro Se, elected as a State Democratic Party Delegate and the remaining Presidential Electors from Virginia cast their Electoral votes; in an attempt to block the certification of the Electoral votes from Virginia, by a member of Defendant, MAGA, who was under the tutelage of Liberty University professor and Director of the Amistad Project, indefinitely disbarred former Kansas Attorney General, Phill Kline, one of the architects of Defendant, Donald Trump and Defendant, MAGA's, multi-state scheme to subvert democracy and violate the United States Constitution, by replacing the valid Electoral Votes, Certificates of Ascertainment, with invalid Electoral Votes, Certificates of Ascertainment, corruptly declaring private office seeker, Defendant, Donald Trump, winner of the 2020 Electoral College process, that culminated on January 6th, 2021, with an organized multi-prong attack that utilized the crowd effect, planned and compelled terrorist acts, by private office seeker Defendant, Donald Trump and Defendant, MAGAs', stochastic terrorism, to disrupt the Electoral College process, the counting of the valid Electoral Votes, Certificates of Ascertainment, by attacking the Electoral College process, attempting to replace the valid Certificates of Ascertainment from Arizona, then when that was not successful thanks to Vice President Mike Pence upholding his oath to the United States Constitution, attacking the United States Capitol, injuring and killing members of the Capitol Police, while attempting to kidnap and execute the Vice President of the United States, attempting to kidnap and execute members of the United States Congress, attacking the very Constitution on which the federal constitutional representative democracy the United States stands; that utilized the crowd effect and terrorist acts compelled by private office seeker, Defendant, Donald Trump and Defendant, MAGAs', stochastic terrorism, to obstruct the Electoral College process, during the counting of the valid Electoral Votes, Certificates of Ascertainment, in an effort to replace the valid Electoral Votes, Certificates of Ascertainment, for Joe Biden, with invalid Certificates of Ascertainment, corruptly declaring private office seeker Defendant, Donald Trump, winner of the 2020 Electoral College Vote, Presidential Electors, and Office of the President of the United States, in violation of my, Plaintiff, David Linton, Pro Se's, 1st Amendment Rights, "the expression of a political view implicates a First Amendment right." *DOE v. REED*, 586 F. 3d 671, (2010), 4th Amendment Rights, "The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause," 5th Amendment Rights, "No person shall be... deprived of life, liberty, or property, without due process of law", and 9th Amendment Rights, "The enumeration in the Constitution, of certain rights, shall not be construed to deny or disparage others retained by the people.", guaranteed by the United States Constitution.

Paragraph 10

Defendant, Donald Trump conspired with Defendant, MAGA, retired United States Army lieutenant general Michael Flynn, Eric Trump, Don Jr Trump, Clay Clark, Alex Jones, and Michael Petro among others both listed and those unknown, to form what can only be characterized as an antichrist white nationalist roadshow, the ReAwaken America tour, an ordinance delivery system, committing stochastic terrorism; spreading Covid-19 disinformation, Covid-19 conspiracy theory booklets containing antisemitic propaganda including an antisemitism riddle that is the basis for most modern conspiracy theories, a pamphlet that spreads an antimasking conspiracy equating masking to the stars Jews wore to dehumanize them during the Holocaust, and other racist propaganda, creating animosity by Whites towards Jews, Asians

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and Blacks, lies about the Bible, as a method to spread White Christian Nationalism and incite an insurrection by one race against another race, false election conspiracies, and other subversive materials, as a mechanism to undermine faith in democratic processes and democratic institutions, in Virginia and throughout the United States; as an ignition, to destabilize the United States, for financial gain.

Paragraph 11

Defendant, Donald Trump conspired with Defendant, MAGA, Stephen Miller, Gene Hamilton, Ian Prior and John Zadrozny among others both listed and those unknown to utilize America First Legal and Citizens for Sanity, as ordinance delivery systems, to commit stochastic terrorism, as a mechanism to build animosity between races, by spreading subversive materials, utilizing various mediums including print, internet, and broadcast, to incite one race to insurrection against another race, spread Covid-19 conspiracies, and false election conspiracies, to undermine faith in democratic processes and democratic institutions, in Virginia and throughout the United States, as an ignition, to destabilize the United States, for financial gain.

Paragraph 12

Defendant, Donald Trump and the Defendant, MAGA, wing of the Republican Party conspired with Nick Fuentes among others both listed and those unknown to commit stochastic terrorism, distributing subversive materials using various forms of media including print, internet, and broadcast, to incite an insurrection by one race against another race, spread Covid-19 conspiracies, and sow distrust in democratic processes and democratic institutions, as a method to destabilize the United States, for financial gain.

Paragraph 13

Defendant, Donald Trump and Defendant, MAGA, Ron DeSantis among others both listed and those unknown, conspired to spread Covid-19 conspiracies, lies about the Bible, lies about United States history, election lies and other subversive propaganda, through various mediums including print, internet, and broadcast; to foment animosity between races and incite an insurrection against one race by another race, spread White Christian Nationalism and undermine faith in democratic processes; including a television ad DeSantis made where he read a book that was made as an ordinance delivery system, to a child, the book called Defendant, Donald Trump, king and spread false election conspiracies, to indoctrinate children for Defendant, Donald Trump, and Defendant, MAGA, by undermining children's faith in democratic processes and democratic institutions; as a mechanism to destabilize the United States, for financial gain.

Paragraph 14

Defendant, Donald Trump, and Defendant, MAGA, Steve Bannon among others both listed and those unknown, conspired to spread covid-19 conspiracies, build animosity between races to incite one race to insurrection against another race, and spread election lies and other false propaganda to undermine faith in democratic processes, as a method to destabilize the United States, for financial gain.

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Paragraph 15

Defendant, Donald Trump, and Defendant, MAGA, Nick Fuentes among others both listed and those unknown, conspired to utilize print, internet, and broadcast to commit stochastic terrorism; spreading Covid-19 conspiracies, animosity between races to incite one race to insurrection against another race, and false election conspiracies, to undermine faith in democratic processes and democratic institutions, as a method to destabilize the United States, for financial gain.

Paragraph 16

Defendant, Donald Trump, and Defendant, MAGA, Dinesh D'Souza conspired with True the Vote, Catherine Engelbrecht, Gregg Phillips, Salem Media, Sebastian Gorka, Larry Elder, Charlie Kirk and Dennis Prager among others both listed and those unknown, to produce a false propaganda film and book called "20,000 Mules" to indoctrinate and radicalize citizens of the United States, by using subversive materials to build support for Defendant, Donald Trump and Defendant, MAGA, in a RICO conspiracy and conspiracy against rights, committing stochastic terrorism; sowing distrust in democratic processes and democratic institutions, as a mechanism, to destabilize the United States, for financial gain.

Paragraph 17

Defendant, Donald Trump and Defendant, MAGA, created a social media company, Truth Social, with funding from Russia, as an ordinance delivery system, that distributes subversive materials to indoctrinate and radicalize citizens of the United States; using Covid-19 conspiracy theories, QANON conspiracy theories, White Christian Nationalist ideologies, false election conspiracies and other subversive propaganda; stochastic terrorism, terrorism that transcends national boundaries, as a mechanism to incite one race to insurrection against another race, and sow distrust in democratic processes and democratic institutions, including Federal elections; as an ignition, to destabilize the United States, for financial gain.

Paragraph 18

Angela McArdle, "Mises Caucus", MAGA Libertarians, Nick Brana, the People's Party, MAGA Communist, and Russia, organized an antiwar rally "Rage Against the War Machine" spreading subversive materials, false conspiracy theories to incite one race against another, antisemitic conspiracy theories, false election conspiracies, and other false propaganda, stochastic terrorism, as an ordinance delivery system, for Russia, including having propagandist who work for Russian state media commit stochastic terrorism at the event, including MAGA Communist, Jackson Hinkle, Jimmy Dore, and Max Blumenthal, to destabilize the United States, for financial gain.

Paragraph 19

Defendant, Donald Trump, and Defendant, MAGA, conspired with Russia, to create a false propaganda regime, that distributes subversive materials to indoctrinate and radicalize citizens of the United States; committing terrorism that transcends national boundaries, stochastic terrorism; "A propaganda campaign is the coordinated use of multiple separate propagandas to inspire the same belief or action, or a related set of beliefs or actions. A propaganda regime is such a campaign that achieves a hegemonic status over a society, such that it is widely accepted and nearly inescapable for those within the society, making refutation of it a seemingly futile effort."

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(Badalamenti, Michael (2021) "An Epistemological Account of the Logic of Propaganda," Proceedings of GREAT Day: Vol. 2020, Article 16.); utilizing multiple channels of communication including print, internet, telecommunications, television, and radio broadcast, as ordinance delivery systems; to destabilize the United States, for financial gain.

Paragraph 20

Amshale Energy LLC CEO, John Houghtaling, sought investors through his Russian wife, finding 3 Russian investors, Andrey Kunatbaev, Mikhail Yuriev, and Konstantin Nikolaev. John Houghtaling via his solely owned corporation HE Ventures LLC, borrowed funds from Eucla Investments Ltd., a foreign entity located in the British Virgin Islands, in the amount of \$18,750,000, to purchase 7.125% of American Methane LLC's shares and the Russian investors borrowed funds in the amount of \$5,000,000, via Bluebell Investments, a foreign entity located in the British Virgin Islands, to purchase 40.375% of the outstanding shares of American Methane LLC. Both Eucla Investments Ltd., and Bluebell Investments are both owned in part by American Methane LLC's Russian owners. John Houghtaling established American Methane LLC, in Louisiana, in 2014, he stated the purpose of American Methane LLC is to liquify and export ethane from the United States. American Methane LLC, and is owned primarily by Russians (52.5%), Alexander Voloshin and Alternative LLC, an entity owned by Russian oligarch Roman Abramovich. In November 2017 John Houghtaling, signed export deals with officials in China, even though American Methane LLC was in the business development stage, had not generated any income and was completely reliant on Russian investors for funding. Then John Houghtaling used American Methane LLC to funnel Russian money into the Defendant, MAGA, wing of the Republican Party via Kyle Ruckert of Bold Strategies, American Methane's Washington Lobbyist. In total according to known receipts John Houghtaling conspired with Russia and Defendant, MAGA, to funnel \$66,200 of Russian funds to Defendant, MAGA, Republican politicians. \$36,200 of which was in violation of 52 U.S. Code § 30118 and the total known amount according to receipts, \$66,200, was in violation of 52 USC §30121.

Paragraph 21

John Houghtaling also donated to Senator Lindsey Graham when Graham was the Chairman of the Senate Appropriations Subcommittee on State, Foreign Operations and Related Programs and Senator Robert Menendez chairman of the Senate Committee on Foreign Relations though the source of funding is unknown.

Paragraph 22

Former U.S. Senator from Louisiana, David Bruce Vitter, Mercury Public Affairs, lobbied in Washington for \$108,500 a month on behalf of Russian oligarch Oleg Deripaska to help Deripaska's holding company, Rusal, Russia's largest aluminum company, obtain a reduction in sanctions during the Trump administration.

Paragraph 23

Konstantin Nikolaev, one of the owners of American Methane, is a Russian billionaire who controls Promtechnologies Group according to his wife who is the head of the company, that owns Orsis, a Russian gun maker that sells sniper rifles to the Russian National Guard, that

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reports directly to Vladimir Putin, served on a Russian government-sponsored council for public-private partnerships in the military-industrial sector, along with influential oligarchs like Oleg V. Deripaska, a longtime associate of the Trump campaign's convicted former chairman, Paul J. Manafort, has been a discreet source of funds for business ventures useful to the Russian military and security services, a delegation from the NRA visited Orsis in December 2015, that included former NRA president David Keene accompanied by Russian operative Maria Butina, in 2011, then-NRA president David Keene befriended Russian banker & politician Alexander Torshin. Torshin then joined with Maria Butina to form a Russian gun rights group supposedly modeled after the NRA called the Right to Bear Arms. Konstantin Nikolaev funded the gun rights organization in Russia founded by Russian operative Maria Butina, who has been convicted of conspiring to infiltrate influential conservative organizations, including National Rifle Association and National Prayer Breakfast, to push Moscow's agenda, with her boyfriend, GOP operative Paul Erickson.

Paragraph 24

Republican political operative Jesse Benton was convicted in Federal court of funneling \$25,000 from Russian Roman Vasilenko to Defendant, MAGA, Defendant, Donald Trump's, 2016 presidential campaign.

Paragraph 25

I, Plaintiff, David Linton, Pro Se, demand \$200,000,000 in compensatory damages, \$200,000,000 in nominal damages, and \$200,000,000 in punitive damages, for Defendant, Donald Trump and Defendant, MAGA's, violation of my, Plaintiff, David Linton, Pro Se's, 1st Amendment Rights, \$200,000,000 in compensatory damages, \$200,000,000 in nominal damages, and \$200,000,000 in punitive damages, for Defendant, Donald Trump and Defendant, MAGA's, violation of my, Plaintiff, David Linton, Pro Se's, 4th Amendment Rights, \$200,000,000 in compensatory damages, \$200,000,000 in nominal damages, and \$200,000,000 in punitive damages, for Defendant, Donald Trump and Defendant, MAGA's, violation of my, Plaintiff, David Linton, Pro Se's, 5th Amendment Rights, and \$200,000,000 in compensatory damages, \$200,000,000 in nominal damages, and \$200,000,000 in punitive damages, for Defendant, Donald Trump and Defendant, MAGA's, violations of my, Plaintiff, David Linton, Pro Se's, 9th Amendment Rights, guaranteed by the United States Constitution, multiplied by three due to terrorism that transcends national boundaries, stochastic terrorism, then multiplied by three again for RICO, for a total of \$21,600,000,000 in damages, for Defendant, Donald Trump's and Defendant, MAGA's, violations of my, Plaintiff, David Linton, Pro Se's, 1st Amendment Rights, 4th Amendment Rights, 5th Amendment Rights, and 9th Amendment Rights, guaranteed by the United States Constitution.



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Date